

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
NORTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 21-10046

Plaintiff,

REDACTED INDICTMENT

vs.

Abusive Sexual Contact  
18 U.S.C. §§ 1153, 2244(b), and  
2246(3)

RICHARD REUBEN SIMON,

Defendant.

Assault of a Federal Employee  
18 U.S.C. § 111(a)

Assault with Intent to Commit Felony  
18 U.S.C. §§ 113(a)(2) and 1153

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The Grand Jury charges:

COUNT 1

On or about the 16th day of August, 2021, in Roberts County, in Indian country, in the District of South Dakota, the Defendant, Richard Reuben Simon, an Indian, did knowingly engage in, and attempt to engage in, sexual contact with Tenecia Lancaster without her permission, all in violation of 18 U.S.C. §§ 1153, 2244(b), and 2246(3).

COUNT 2

On or about the 16th day of August, 2021, in the District of South Dakota, the Defendant, Richard Reuben Simon, did forcibly assault, resist, oppose, impede, intimidate, and interfere with Tenecia Lancaster, with such acts involving physical contact, while Tenecia Lancaster was employed as a federal health care professional with the Indian Health Service, U.S. Department of

Health and Human Services, assigned to perform health care functions, while Tenecia Lancaster was engaged in the performance of her official duties, all in violation of 18 U.S.C. §111(a).

COUNT 3

On or about the 16th day of August, 2021, in Roberts County, in Indian Country, in the District of South Dakota, the Defendant, Richard Reuben Simon, an Indian, did unlawfully assault Tenecia Lancaster, with the intent to commit a felony, that is sexual contact, and said assault did occur while he was committing the federal felony of sexual contact, all in violation of 18 U.S.C. §§ 113(a)(2) and 1153.

A TRUE BILL:

**Name Redacted**

\_\_\_\_\_  
Foreperson

DENNIS R. HOLMES  
Acting United States Attorney

By: \_\_\_\_\_

